

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WAYNE FARMS LLC)	Civil Action No.: 20-5191
)	
Plaintiff,)	Judge Feinerman
v.)	
)	Magistrate Judge Valdez
JOHN DOE AND ,)	
LINKEDIN CORPORATION)	
)	
Defendants)	
)	

DECLARATION OF PATRICK J. GOMEZ

- (1) My name is Patrick J. Gomez (hereafter sometimes “Real Pat Gomez”) and I am employed as Senior Sales Manager of Wayne Farms LLC and my residence is in Tucson, AZ.
- (2) I have been employed in that position since 2017 and was National Account Manager from 2014 to 2017. Prior to that I have been in the poultry business since approximately 2000 and in foodservice since 1998.
- (3) I have had an accurate profile, posted by me, on the social network site LinkedIn since 2013.
- (4) On or about July 20, 2020 it was communicated to me that someone (hereafter sometimes “fake Pat Gomez” or “John Doe”) was claiming to be me and contacting customers. The fake Pat Gomez used an email address “patrickwaynefarms@consultant.com” .
- (5) On or about July 20, 2020, I began investigating and discovered the fake Pat Gomez account on LinkedIn.

- (6) On or about July 25, 2020 I followed the LinkedIn “Reporting Fake Profiles” instructions and procedures to report the fake Pat Gomez profile was fake.
- (7) On or about July 25, 2020 I also posted a message on my own LinkedIn account that there was a fake profile and the account was a fraud and that the contacts and associates of the real Pat Gomez needed to beware of contacts from the fake Pat Gomez.
- (8) The fake Pat Gomez profile and other aspects of the account briefly were unviewable on LinkedIn.
- (9) On August 5th, 2020 I, and other employees of Wayne Farms, noticed the fake Pat Gomez profile and other aspects of the account was back up and running.
- (10) On August 5th, 2020 it is my understanding that my co-worker at Wayne Farms, submitted two notifications following the LinkedIn “Reporting Fake Profiles” instructions and procedures notifying linked in that this was an imposter account, and an account violating linked in standards.
- (11) The fake Pat Gomez profile and account remained available on LinkedIn. A copy of a screen shot of the fake profile as of August 17, 2020 is in Exhibit 5 accompanying this Declaration.
- (12) On August 11, 2020 WAYNE FARMS was contacted by an employee of a customer in Italy asking to verify if fake Pat Gomez worked for us as they were about to wire funds. WAYNE FARMS advised he did not that that he was a fraud. They had placed an order. Exhibit 6 is a copy of the email forwarded by me to Wayne Farms in-house attorney and in turn forwarded to Wayne Farms’ outside attorney,

with privileged information redacted. The email specifically identifies a telephone number xxx yyy-6903.

(13) On August 17, 2020 WAYNE FARMS was contacted by a customer in Florida, USA who had been solicited by the fake Pat Gomez to induce them to place an order. Wayne Farms notified the customer of the fraud. Exhibit 7 is a copy of the email forwarded to Wayne Farms in-house attorney and in turn forwarded to Wayne Farms' outside attorney, with privileged information redacted. The email specifically identifies a Whats App number xxx yyy-6903.

(14) Wayne Farms employee Rose Locke, specifically followed the LinkedIn "Reporting Fake Profiles" instructions and procedures to report the fake Pat Gomez profile on August 19, 2020. A copy of screen shots of Ms. Locke's submission are in Exhibit 8.

(15) Also on August 19, 2020, Andrew Piper filed another fake profile report with LinkedIn. Screen shots of portions of the August 19, 2020 reports by Mr. Piper to LinkedIn are in Exhibit 9.

(16) On August 20, 2020 Wayne Farms was contacted by a second customer about a solicitation from the fake Pat Gomez. WAYNE FARMS notified them he was a fraud and asked that they notify LinkedIn of the fraud. Exhibit 10 is a copy of the email. The email specifically identifies a Whats App number xxx yyy-6903. The email included an Attachment called the WAYNE FARMS LLC USA DATA SHEET.

(17) Wayne Farms asked a customer to contact the fake Pat Gomez using the Whats App/ phone number identified in the preceding exhibits. Exhibit 11 is a screen shot

of an August 26, 2020 text communication on a mobile device between an existing customer of Wayne Farms and the mobile number listed on the fake Pat Gomez emails, xxx yyy-6903. This identifies Wells Fargo Account xxxx6603

(18) Exhibit 12 is a screen shot of an August 28, 2020 text communication on a mobile device between an existing customer of Wayne Farms and the mobile number listed on the fake Pat Gomez emails, xxx yyy-6903. This identifies BB&T Bank Account xxxx6395

(19) On or about August 31, 2020 yet another customer was solicited by JOHN DOE to make a deposit on an order. This customer has a place of business in the Northern District of Illinois. This customer checked the authenticity of the contact with WAYNE FARMS and was informed that the solicitation was inauthentic. A copy of the forwarded customer email with privileged information redacted is Exhibit 13. The LinkedIn message was an attachment and specifically identifies a Whats App number xxx yyy-6903.

DECLARATION

The undersigned being hereby warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, declares that the statements made of his/her own knowledge are true and that all statements made on information and belief are believed to be true.

Dated: 9/8/2020



Patrick J. Gomez
Tucson, AZ